

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE CHESAPEAKE ENERGY
SHAREHOLDER DERIVATIVE
LITIGATION

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Lead Case No. 5:11-cv-985-M

Relating to:
ALL ACTIONS

**JACOB SHOCHAT’S MOTION TO EXPEDITE BRIEFING REGARDING
JACOB SHOCHAT’S MOTION FOR LEAVE TO INTERVENE**

COMES NOW, Proposed-Intervenor Jacob Shochat (“Intervenor Shochat”) who, pursuant to Local Civil Rule 7.1(g), respectfully moves this Court for an order shortening the time for Plaintiffs and Defendants to respond to Jacob Shochat’s Motion for Leave to Intervene and Memorandum of Law (the “Intervention Motion”), which is being filed concurrently herewith.

As described more fully in the Intervention Motion, Intervenor Shochat seeks to intervene in the instant action in order to file an opposition to the currently-pending Plaintiffs’ Motion to Lift Stay, *see* Dkt. No. 44 (the “Lift Stay Motion”), and through this motion seeks to shorten the time for the briefing of the Intervention Motion in an effort to ensure that, if granted, this Court has an opportunity to timely and adequately consider Intervenor Shochat’s opposition memorandum before ruling on the Lift Stay Motion.

The issues presented in the Intervention Motion are not complex, and providing a completed briefing process and a ruling from this Court within a shortened period is reasonable. The Intervention Motion merely requests that this Court issue an order

allowing Intervenor Shochat to intervene in this action for the purpose of filing an opposition to the currently pending Lift Stay Motion. The parties to the action, if opposed to the Intervention Motion, would only be required to respond to this single motion—not an undue burden. A drawn out and extended briefing schedule will simply delay the point in time when this Court will rule on the Intervention Motion and, accordingly, possibly require the Court to rule on the Lift Stay Motion without the benefit of considering Intervenor Shochat's opposition.

Therefore, Intervenor Shochat respectfully requests this Court require any party wishing to respond to the Intervention Motion file such an opposition within a shortened period of time, as so ordered by this Court.

Respectfully submitted this 15 day of May, 2012

By: /s/ Don S. Strong

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 15, 2012, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the court's electronic filing system. I also certify that I have served this filing by first class mail to all counsel of record listed below.

/s/ Don S. Strong
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